

**BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2020-2-E**

IN RE: Annual Review of Base Rates for)	
Fuel Costs for Dominion Energy)	
South Carolina, Incorporated)	
)	
)	
)	

**PETITION
TO
INTERVENE**

This Commission established Commission Docket 2020-2-E, on April 16, 2019, for this Commission's review of the fuel purchasing practices and policies of Dominion Energy South Carolina, Incorporated, ("DESC", or "Company"), pursuant to S.C. Code Ann. Section 58-27-865 (Supp. 2019) and coincident with this proceeding and pursuant to S.C. Code Ann. § 58-39-140, the Commission will also determine whether an increase or decrease should be granted in the fuel cost component designed to recover the incremental or avoided costs incurred by the Company to implement the distributed energy resource program previously approved by this Commission.

Petitioner herein is Ecoplexus Inc., ("Ecoplexus" or "Petitioner"). This Petition to Intervene is filed pursuant to R. 103-825, of this Commission's Rules and Regulations and other applicable Rules and Regulations of this Commission, and Petitioner seeks permission to intervene and be made a party of record in the above-referenced Docket, with full rights of participation.

1. Ecoplexus is a Delaware Corporation, domesticated by the South Carolina Secretary of State's Office to conduct business in South Carolina. Ecoplexus maintains an office at 600 Park Office Dr., Suite 285, Durham, North Carolina 27709 in addition to locations in San Francisco and Dallas.

2. Ecoplexus is a leader in the development, design, engineering, construction, financing, operations and ownership of renewable energy systems for the commercial, government and utility markets. Ecoplexus develops, builds, owns and operates clean energy projects and has completed, or has in construction, over 400 megawatts of utility-scale renewable generation facilities in North America.

3. Specifically, the grounds for the Petition are that Petitioner conducts business with DESC and has a material interest in the subject matter of this Docket.

4. As outlined hereinabove, Ecoplexus has substantial business interests in DESC's assigned territory in South Carolina.

5. Petitioner's position is that Ecoplexus is an interested party and it has a direct and substantial interest in the review to be made by this Commission in this Docket and Petitioner's interests cannot be adequately addressed by any other party. Petitioner's further position is that Ecoplexus will be impacted by this Commission's decisions upon its review, outlined hereinabove. Therefore, the review of this Commission is important to the Petitioner from a financial standpoint. Petitioner's further position is that Petitioner's Intervention will aid this Commission, by assisting in the development of a full and fair record to address the important review to be conducted in this Docket.

6. Therefore, Ecoplexus is financially impacted by this Commission's Review of DESC's filing, as is outlined in more detail hereinabove.

7. Petitioner should be allowed to intervene in this Docket, with full rights of cross-examination, discovery and participation in any Hearing to be scheduled in this Docket.

8. The granting of Ecoplexus' Petition to Intervene is (i) in the public interest and (ii) consistent with the policies of this Commission in encouraging maximum public participation in issues before it and intervention should be allowed so that a full and complete record addressing its views and concerns can be developed.

9. This Petition to Intervene is timely filed with this Commission.

10. Petitioner Ecoplexus has previously received approval for intervention from this Commission, including Commission Docket 2018-202-E, Docket 2019-176-E, Docket 2019-184-E, Docket 2019-185-E, Docket 2019-186-E, Docket 2019-195-E, Docket 2019-196-E and Docket 2019-197-E.

11. Ecoplexus is represented by counsel in this proceeding:

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WHEREFORE, Petitioner prays for the following relief:

- (a) That this Petition to Intervene be accepted and that Petitioner be made a party of record;
- (b) That Petitioner be allowed to participate fully in this proceeding and take such positions as it deems advisable; and
- (c) For such other and further relief as is just and proper.

Respectfully Submitted,

/s/Richard L. Whitt

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Counsel for Petitioner, Ecoplexus Inc.

December 2, 2019